

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

COREY HARDIN, DAVID MUHAMMAD, and  
CHASE WILLIAMS, individually and on behalf of  
all others similarly situated,

Plaintiffs,

v.

TRON FOUNDATION, JUSTIN SUN, and ZHIQIANG  
(LUCIEN) CHEN,

Defendants.

No. 1:20-cv-02804-VSB

NOTICE OF VOLUNTARY  
DISMISSAL PURSUANT TO  
F.R.C.P. 41(a)(1)(A)(i) OF  
CLAIMS OF DAVID  
MUHAMMAD

**NOTICE OF VOLUNTARY DISMISSAL PURSUANT TO F.R.C.P. 41(a)(1)(A)(i) OF  
CLAIMS OF PLAINTIFF DAVID MUHAMMAD**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), Plaintiff David Muhammad, through his counsel, hereby gives notice that he voluntarily dismisses all of his claims against all Defendants in the above captioned matter (the “Action”), without prejudice and without costs or attorneys’ fees to any party.

To avoid any ambiguity, the two remaining Plaintiffs, Corey Hardin and Chase Williams, will continue to serve as lead plaintiffs in the Action and will continue to diligently prosecute all their claims on behalf of the Proposed Class. The withdrawal of David Muhammad as a plaintiff will not affect any of the issues currently under the Court’s consideration as part of Defendants’ motion to dismiss, ECF No. 54.

Dated: May 12, 2021  
New York, NY

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*Co-Lead Counsel and Attorneys for  
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